

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
MANHATTAN DIVISION**

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In re:

Arlene Blair
aka Arlene Y. Blair,

Debtor.

**NOTICE OF MOTION FOR
TERMINATION OF THE AUTOMATIC
STAY AND CO-DEBTOR STAY**

Chapter: 13
Case No.: 18-10292-cgm
Judge: Hon. Cecelia G. Morris

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PLEASE TAKE NOTICE that on May 5, 2022 at 9:00 a.m., or as soon thereafter as counsel can be heard, the undersigned attorneys for Secured Creditor, U.S. Bank National Association ("Movant"), seeks relief from the automatic stay and co-debtor stay as to the real property commonly known as 1325 East 233RD Street, Bronx, New York 10466 and will move before the United States Bankruptcy Court, Honorable Cecelia G. Morris, United States Bankruptcy Judge, One Bowling Green, New York, New York 10004-1408 for an Order:

1. Pursuant to 11 U.S.C. §§ 362(d)(1) and (d)(2) granting Movant, its successors and/or assigns, relief from the automatic stay in effect pursuant to 11 U.S.C. § 362(a), and relief from the co-debtor stay in effect pursuant to 11 U.S.C. § 362(c), allowing Movant to pursue a mortgage foreclosure and/or other remedy under state law; and
2. Granting Movant such other and further relief as is just and proper.

PLEASE TAKE FURTHER NOTICE that answering affidavits, if any, are required to be served upon the undersigned at least seven (7) days before the return date of this motion.

Dated: April 6, 2022

Respectfully Submitted,
By: /s/Phillip Raymond
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